

Town of Sanford, Maine

Planning Department

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(207) 324-9150 FAX (207) 324-9166

R01-12-C-044

November 28, 2011

Environmental Management Support, Inc.

Attn: Mr. Donald West

8601 Georgia Avenue, Suite 500

Silver Springs, MD 20910

Phone: (301) 589-5318

Transmittal Letter

Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

Dear Mr. West

The Town of Sanford, Maine is located on the Mousam River at the foothills of the White Mountains in the Southwestern corner of Maine. We have a long history of turning significant challenges into opportunity. Sanford thrived in the late 1800s when the Goodall Mills dominated the downtown portion of Sanford. However, when the mill closed in the 1950s, more than 3,500 Sanford residents lost their jobs. Sanford turned this mill closing into opportunity and recruited several large industrial facilities to relocate to the area.

With the increase of globalization in the 1980s and 1990s, the industrial base within Sanford dwindled as businesses, including those recruited in the 1950s, slowly relocated or went out of business all together. With the loss of industry, Sanford has seen an increase in the unemployment rate, which is currently the highest in the southern part of Maine at 11.4 percent (January 2011, MicropolitanNECTA data). The loss of good paying, stable manufacturing jobs has also elevated the poverty rate within Sanford which is currently at 15.2 percent (2005 to 2009 US Census Estimate).

The projections for Sanford's future are getting worse. The Sanford median income is currently at \$38,219 and expected to drop below 80% of the State of Maine's median income. That was \$15,915 less than the York county average, \$8,322 less than the state median, and \$12,002 less than the U.S. median income. In addition, Sanford's future population is expected to contain more and more of the regions lower income households. Because of the decrease in employment opportunities and in median income, the average Sanford resident has trouble finding work or affordable housing in Sanford.

The Town's loss of manufacturing in its economic base affects not only the employment opportunities and median income of residents, but also affects the physical environment of the Town. Many of the former industrial are now abandoned, deteriorating, and affected by contaminated media (soil, groundwater, sediment, surface water, and building materials).

Reversing these trends requires a community-wide effort. This kind of wholesale change involves taking significant risks by investing in the community's uncertain future. Today, Sanford is facing these challenges and turning them into new opportunities. Based on the long

history of industrial use and the lack of environmental stewardship displayed by the former owners and occupants of Sanford's Mill Yard, the remediation challenges associated with the redevelopment of the site are tremendous, so much so that they are currently making redevelopment unviable. The Town of Sanford respectfully requests a \$200,000 cleanup grant to help defray the costs of cleanup and help make the redevelopment of the Sanford Transportation Center site a reality.

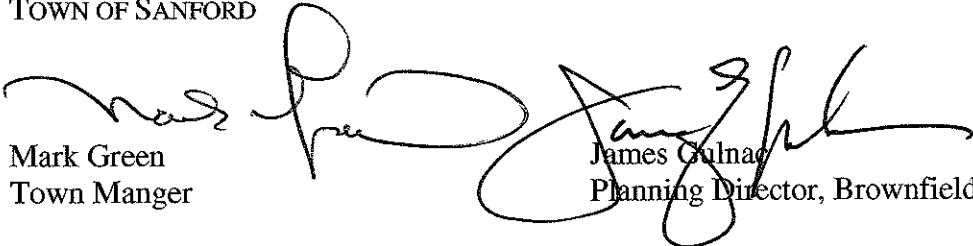
Required information follows:

- a. Applicant Identification: Town of Sanford, 919 Main Street, Sanford, Maine 04073
- b. Applicant DUNS Number: 093629723
- c. Funding Requested:
 - i. Grant Type: Cleanup
 - ii. Federal Funds Requested: \$200,000(not requesting waiver for 20% cost share)
 - iii. Contamination: Petroleum
- d. Location: Town of Sanford, York County, Maine
- e. Complete Property Name and Address: Millyard Road, Map J29, Lot 17E, Sanford, ME 04073
- f. Contacts:
 - i. Project Director: James Gulnac, AICP, Planning Director, Brownfields Project Coordinator, Town of Sanford, 919 Main Street, Sanford, Maine 04073; (207) 324-9150 (phone); (207) 324-9166 (fax); jgulgulnac@sanfordmaine.org (e-mail)
 - ii. Chief Executive: Gordon N. Paul, Town Council Chairperson; Town of Sanford, 919 Main Street, Sanford, Maine 04073; (207) 324-9173 (phone); (207) 324-9124 (fax); gpaul@sanfordmaine.org (e-mail)
- g. Date Submitted: November 28, 2011
- h. Project Period: July 2012 through June 2015
- i. Population Served: 20,798 within Town of Sanford and adjacent areas.
- j. Special Considerations: See Attachment 7 of attached Grant Application

We are a Town full of determined people committed to facing these challenges head on. We thank you in advance for considering our grant application. If you should have any questions or require clarification on any element of this proposal, please give me a call at (207) 324-9173.

Very truly,
TOWN OF SANFORD

Mark Green
Town Manger



James Gulnac
Planning Director, Brownfields Project Coordinator

cc: *with attachments*

Diane Kelley, EPA Region 1 Brownfields Coordinator
Jean Firth, State of Maine DEP

NARRATIVE PROPOSAL

1. Community Need

1.a. Health, Welfare, and Environment

The Town of Sanford developed its industrial base in the late 1860s when Thomas Goodall established Goodall Mills in the center of the downtown. Skilled textile workers were attracted to Sanford from the woolen centers of England, the French-speaking provinces of Canada, and from other foreign countries. When the mill closed down in the 1950s, more than 3,500 Sanford residents lost their jobs. At this time the Sanford Chamber of Commerce as well as the Sanford Industrial Development Corporation responded with an active campaign to maintain the industrial base within Sanford. These two organizations were very successful and attracted several large industrial companies to the area including the Wasco Chemical Company, American Cyanamid, Pioneer Plastics, Eastern Plastics Corporation, North Star Woolen, Colonial Aircraft Corporation, Alloy Products Company, Sanford Dress Company, Sanford Weaving Company, Aletta Manufacturing Company, and Sprague Electric Company. In 1965, based on the popular motto coined by the Sanford Chamber of Commerce, Life magazine referred to Sanford as “the Town that refused to die.” Even in 1980, 53% of Sanford’s employed population was in skilled labor. However, with the increase of globalization in 1980s and 1990s, the industrial base dwindled as businesses either relocated or ceased operation. Of the above companies, none remain in Sanford. But their abandoned buildings still remain.

The reduction in manufacturing for its economic base over the years hurts not only the employment opportunities and median income of residents, but also the physical environment of the Town. Many of the large mills that surround the Mousam River are now abandoned and deteriorating or severely underutilized. Not only do these structures appear as eyesores, but they serve as a constant reminder of the rich industrial heritage of the past and the daunting challenges of the present. Furthermore, wastes produced from the mills were historically discharged to the river or deposited in exterior areas, contaminating soil, groundwater, sediment, surface water, and building materials. These wastes are being uncovered today making the properties undesirable to purchase or too cost prohibitive to redevelop, despite their ideal location and historic significance.

Number, Size, and Impacts of Brownfields: Sanford’s industry shift and economic decline has created at least 80 acres of Brownfields on more than 30 Brownfields sites. These sites include huge vacant and foreboding mill buildings and manufacturing plants like the Sanford Mill, International Woolen Mill, and Stenton Trust Mill, enormous bulk petroleum facilities, and shuttered commercial operations such as dry cleaners, construction companies, auto repair facilities, and gasoline stations. Many of these sites are in the historic Mill Yard, which is the symbol of the Sanford’s distress and also the heart of our economic and population centers. The Mill Yard is the target area of this grant.

Environmental Impacts of Brownfields: A long history of industrial use has resulted in the contamination of 20 Brownfields sites within the Mill Yard target area, covering 30 acres. Contaminated soil, groundwater, soil vapor, and hazardous building materials have been detected at several sites that have been investigated under Sanford’s Brownfields Assessment Program. These include the Stenton Trust Mill, with chlorinated solvents and petroleum contamination as well as asbestos issues; the former Goodall Mill tank area site, with petroleum contamination; the Aerofab site with impact by metals, chlorinated solvents, and asbestos; the International Woolen site with metals, petroleum, and chlorinated solvent contamination issues; and the Sanford Transportation Center site

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(the subject of this cleanup grant) with petroleum contamination.

Health Impacts of Brownfields: Each of these Brownfields sites presents a significant risk to human health through exposure to vapors and impacted groundwater, which have permeated residents and businesses, or contact with contaminated soil and building materials. Many of the human health threats in the Mill Yard stem from the use of dyes, solvents, and fuels during more than 100 years of industrial use. A summary of these contaminants and associated health impacts is presented below:

Contaminant	Historical Use	Exposure Route	Health Effects
Petroleum	Heating, power	Vapor inhalation, ingestion, dermal absorption	Skin and lung irritation, headaches, dizziness, fatigue, cancer, nervous and digestive system damage.
Heavy metals	Dyeing processes	Ingestion, dermal absorption	Retardation, neurological damage, various cancers, kidney damage
Chlorinated solvents and other volatile compounds	Equipment maintenance, industrial processes	Vapor inhalation, ingestion, dermal absorption	Dizziness, fatigue, headaches, chronic skin problems, and damage to the nervous system, kidneys, and liver.
Lead	Paint	Inhalation, ingestion, dermal absorption	Nervous, circulatory, and reproductive system damage.
Asbestos	Building materials, industrial equipment	Inhalation	Lung cancer and mesothelioma
PCBs	Building materials, industrial equipment	Ingestion, dermal absorption	Various cancers, and damage to the immune, reproductive, nervous, and endocrine systems

Cumulative Environmental Issues and Disproportionate Effects of Brownfields: A review of information presented on the EPA's Envirofacts EnviroMapper application, Sanford is host to a disproportionately high concentration of EPA regulated sites, including those impacted by toxic releases and water releases. Much like the greater degree of risk posed by a site contaminated with multiple chemicals verses one, the severity of the characteristic environmental issues in Sanford is compounded by the sheer number and density of these problem properties. Cumulative health impacts from our Brownfields include higher than average rates of high blood pressure and colorectal and breast cancer, according to the 2007 State of Maine Health reports. Sanford has also been identified as one of five "hot spots" for lead exposure. Based on the EPA Environmental Justice data, the area of Sanford falls into the most severe cancer risk category.

Welfare Impacts of Brownfields: Today, the buildings at Sanford's Brownfields sites are scarred by graffiti and broken windows; the parking lots are cracked and sprouting weeds; the perimeter fences are rusty; the woods are strewn with trash; and the soils are contaminated by decades of industrial use. Police patrol these sites on a daily basis, dealing with squatting by the homeless, midnight trash dumping, arson, assaults, and recurring vandalism. In 2006, former Sanford Police Chief Thomas Jones said "It's a huge toll on our police resources, checking a huge complex for any number of issues; I liken [these abandoned properties] to the third sub-level of a subway...It's a dark void in the middle of town that harbors all kinds of evil." The Maine Center for Disease Control and Prevention and Department of Health and Human Services (CDCP/DHHS) reports the incidence

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of rape and violent crime in York County to be above the state average.

According to the Sanford Comprehensive Plan (2002 Update), the Brownfields sites in Sanford, and particularly in the Mill Yard, drag down the Town's image and cause stress to the resident population. "The perception of Sanford and Springvale as a declining mill town with a poorly skilled workforce limits our ability to attract and develop new high quality employers and to develop a stable, diversified employment base." Reinforcing this view were citizen comments received during a visioning session on the Mill Yard. Consultants Bartram and Cochran of Farmington CT summarized the comments as: "Negative take on Sanford as 'mill-town mentality'", and "Need to improve image of Sanford as mill town - like Lewiston used to be."

Health & Welfare of Sensitive Populations: The Mill area, with its documented levels of contamination, poses a significant risk to people living in close proximity. Children walking to school or outside enjoying recreational activities have the potential to be impacted by contaminated dust blowing in the area of the Mills. In addition, an EPA funded a study determined that chlorinated solvents from a historical dry cleaner had impacted air within the low income homes in the area of the Mill Yard. Furthermore, women of child-bearing age have been disproportionately impacted. This condition is demonstrated through an above average infant mortality rate, rate of live births with low birth weight, and infants born to women receiving first trimester pre-natal care (Cited information based on data for York County, 2008 Maine State Profile of Selected Public Health Indicators, Maine CDCP/DHHS). Sanford's Brownfields sites are concentrated in the most densely populated residential areas as they once supported the former industrial properties. Therefore, the sensitive portion of Sanford's population is most at risk due to the proximity of these contaminated sites. Finally, the Mousam River has been impacted as a result of Brownfields sites. Children and other residents can be exposed to contaminants if playing in the area of the River. Both the River and the young residents are sensitive receptors due to the contaminated Brownfield sites.

1.b. Financial Need

1.b.i. Table of Demographic Information

	Sanford CDP Target Community	York County	Maine	National
Population:	20,798 ⁴	197,131 ⁴	1,328,361 ⁴	308,745,538 ¹
Unemployment:	11.5% ⁵	8.0% ⁵	8.5% ⁵	9.6% ²
Poverty Rate:	15.2% ⁴	8.4% ⁴	12.6% ⁴	14.3% ³
Percent Minority:	6.1% ⁴	3.6% ⁴	4.8% ⁴	26.7% ¹
Per Capita Income	\$19,534 ⁴	\$26,863 ⁴	\$24,980 ⁴	\$26,530 ³
Median Household Income	\$38,219 ⁴	\$54,134 ⁴	\$45,708 ⁴	\$50,221 ⁴
Persons Over Age 65	15.2% ⁴	15.4% ⁴	15.9% ⁴	13.0% ⁴
Bachelor's Degree or Higher	13.1% ⁴	27.7% ⁴	26.1% ⁴	27.5% ⁴
1. Data is from the 2010 U.S. Census data and is available at http://www.census.gov/ 2. Data is from the Bureau of Labor Statistics (September 2011) at www.bls.gov 3. Data is from the 2009 American Community Survey and is available at http://www.census.gov/newsroom/releases/archives/income_wealth/cb10-144.html 4. Data from 2010 U.S. Census Data: http://quickfacts.census.gov/qfd/states 5. Sept. 2011 "Sperling's Best Places to Live" www.bestplaces.net/economy/city/maine/sanford CDP – Census Derived Place				

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Economic Impact of Brownfields: Sanford has never fully recovered from the mill closings which claimed the jobs of over 20 percent of its population. The loss of industry and creation of Brownfields sites have contributed to the downward spiral of disinvestment in our community resulting in a population that, as highlighted by the table above, is struggling with high unemployment (the highest in southern Maine), elevated poverty, low median income, an underserved minority population, and the lack of a skilled and educated workforce. Other data highlighting the impacts of Brownfields on Sanford include:

- People do not have will nor financial resources to maintain their properties resulting in Sanford having the highest housing foreclosure rate in the State of Maine.
- Sanford's property tax rate of \$17.52 per \$1,000 of valuation is significantly higher than surrounding rural towns because, as a service-center community, it supports an infrastructure and services used by the entire region.
- The town is largely bypassed by the lucrative tourist traffic of southern Maine that tends to travel up the I-95 corridor, which is 15 miles away, and skip the Sanford exit.

Limiting Factors to Cleanup Resources: In recent years, Sanford has lost population and seen its tax base shrink. In the first decade of this century, the town's population fell by 3.7 percent, according to the 2010 Census. The overall tax base of \$1.4 billion has shrunk by 11 percent in four years primarily as a result of declines in the housing market and further declines in manufacturing, according to property assessing records. The Town had the highest home foreclosure rate in Maine in 2008. Just this year, downsizing at Cyro and the closure of Wasco reduced the tax base by \$1.5 million. The shrinking tax base translates into a higher tax rate to raise the same amount of revenue or a reduction in services.

In the face of these constraints, the Town has struggled to maintain core services of police, fire, and public works, according to Town Administrator Mark Green. Staff at the police and fire departments has been frozen for the past six years, while staff at public works has been cut by 10-15 percent. Funding new projects or taking on new responsibilities is extremely difficult in Sanford. The Sanford Brownfields Assessment Program estimates cleanup costs at the Sanford Transportation Center Site at more than \$320,000. This is an expense the Town cannot afford without substantial assistance. The cleanup funds are necessary for the project to move forward. In addition, the Town will leverage other sources of funding to make the project a reality. Leveraging is discussed further in Section 2.b.iii.

Need for Additional Brownfields Funds: Sanford's previously awarded 2008 and 2010 Brownfields Assessment Grants have been fully expended. In addition, Sanford will have expended our three other cleanup grants, which were awarded in 2009 and 2010, by the end of this year. Brownfields funding has allowed Sanford to assess and cleanup contaminated properties and is leveraging over \$30 million in public funding and private investment. However, there is much more work to be done and the cleanup of additional properties is crucial to maintaining momentum and improving the livability of Sanford.

2. Project Description and Feasibility of Success

Sanford is the kind of compact, liveable community that can become increasingly attractive in the 21st century. Most houses and businesses are clustered along a central artery that includes Main

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Street and the Mousam River, a largely undeveloped greenbelt that parallels Main Street. Schools are centrally located and within bicycling and walking distance of most residents, and in-town neighborhoods are served by sidewalks.

Political leaders in Sanford have embraced these qualities to leverage economic development opportunities. In 2003, the Town hired its first economic development director and reformed the structure of Town government to make it more nimble and responsive. The goals that the Town Council sets for itself reflect an emphasis on smart growth, livability, and downtown revitalization.

The Mill Yard target area has been a particular focus. Since 2005, the Town has been executing consultants Bartram and Cochran's strategy, which calls for strengthening the connections between the Mill Yard, downtown, and the Mousam River waterfront. In keeping with that vision, the Town has: built a \$2.5 million road/bike path through the Mill Yard; started a National Main Street program; developed a downtown streetscape plan; begun tree planting; started reconstruction of a strategic pedestrian passageway that is integral to the downtown Master Plan; secured a \$675,000 Riverfront Bond to make waterfront improvements, and attracted two developers to the Mill Yard: Northland Enterprises (\$10.5 million investment) and Brady Sullivan (\$20 million investment). This track record shows that the Town has a sustained commitment to not just cleaning up Brownfields sites but ensuring their redevelopment.

2.a. Project Description

2.a.i. Existing Property Conditions

The Sanford Transportation Center site was acquired by the Town of Sanford on November 8, 2011 through a combination of a purchase and a gift. The site is an approximately 0.86-acre parcel of vacant undeveloped land designated by the Town of Sanford as Map J29 Lot 17E. It is located in the center of a historical textile Mill Yard complex and abuts the former location of the Goodall Worsted Mill. The Site has been historically used for textile mill activities.

Phase I and Phase II ESAs were completed through the Sanford Brownfields Assessment Program in January 2007 and May 2008, respectively. A more recent October 2011 Phase I Environmental Site Assessment was completed prior to property transfer. Finally, the field program and data analysis for a supplemental Phase II ESA was completed in November 2011.

Releases of 7,000 to 10,000 gallons or more of No. 6 fuel oil related to an abandoned-in-place 500,000-gallon UST have been documented at the former Goodall Worsted Mill. This property is located upgradient of the Sanford Transportation Center Site and subsurface conduits or other preferential pathways caused petroleum that was released at this upgradient property to impact soil and groundwater at the Site, as well as surface water located adjacent to the Site. The area of impact is considered to include the entire aerial extent of the Site and extends to the groundwater table, which is reportedly 4 to 6 feet below grade. In addition, concentrations of petroleum constituents and chlorinated compounds have been identified in groundwater in one portion of the Site. These conditions, appear to be due to an off-Site source and representative of the overall degradation of the Mill Yard, further compound the risk posed by petroleum contamination at the Site.

Following remediation, the Site is proposed to be redeveloped as a "transit hub" as part of a partnership between the Town of Sanford and York County Community Action Corporation. The transit hub will provide not just transportation related services, but also recreation related services

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due to its strategic location along the Mousam River. The vision is to create a facility that accesses many different areas of transportation: cars, buses, cabs, but also nontraditional forms of transportation including kayaks, bikes, and feet (walking). The Sanford Transportation Center would include parking for cars, a bus pickup area, bike racks, trail connections, a ramp and facilities to access the river, an indoor waiting area, bathrooms, and office space.

A Transportation Committee has already been established to make the project a reality. This committee consists of the Town Manager, Brownfields Coordinator, Economic Development Director, the Grant Coordinator, and Executive Director for York County Community Action Corporation. Accomplishments to date from the committee include the successful assessment and acquisition of the Site, application and award of transportation funding, and preliminary master planning for redevelopment of the site.

A \$1.2 million Federal Transit Administration grant was awarded to construct the facility and will be managed and operated by York County Community Action Corporation, which already manages 19 transit routes in Sanford and outlying areas. If for some reason the facility cannot be constructed in this location, the site will still at a minimum be redeveloped to include parking, trail connections, and access to the Mousam River. The river is flush with water at all times of the year, but has not supported recreational use due to contamination and lack of access. The performance of cleanup activities and construction of a boat ramp would make the river very attractive to paddlers of canoes, kayaks, and inner tubes.

2.a.ii. Proposed Cleanup Plan

Based on the previous Phase II Investigations completed at the Site, the remediation component of the project will consist of: 1) Removal of petroleum contaminated soils from the source areas of the site; and 2) Covering remaining residually contaminated soils at the property with a combined pavement and soil cover system. Each task will utilize standard construction techniques and can be implemented in a short timeframe. The estimated cost for this project is \$269,000 with a 20% contingency of \$54,000.

Specifically, a qualified environmental services provider will be retained to excavate, segregate, characterize, contain, and properly dispose grossly contaminated (i.e. petroleum saturated) soil from the source areas at the Site. The removal of this material will eliminate any potential continuing source of contamination. Finally, consistent with the results of the Phase II ESA, contaminated soil that remains at the Site will be covered with an engineered barrier to properly manage potential risk. During construction, engineering controls will be utilized including dust suppression during excavation activities and the use of temporary fencing to protect the public during construction activities. Once remediation is completed, institutional controls will be placed on the project through the use of Maine's Uniform Environmental Covenant Act. The deed restriction will prohibit the extraction of groundwater from the Site, will specify the maintenance obligations and precautions for the protection of the soil cover, and will also restrict excavation. The restriction will be documented through the Maine DEP Voluntary Response Action Program (VRAP).

2.b. Budget, Measuring Progress, and Leveraging Other Resources

2.b.i. Budget Table and Task Descriptions

The Town of Sanford will utilize Brownfields funding to conduct cleanup activities at the Site. A proposed budget for this petroleum cleanup grant is presented below. **Please note** that the total

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project budget, as determined through the review of completed assessment work and the results of the Draft Analysis of Brownfields Cleanup Alternatives (included as **Attachment 6**) is approximately \$269,000 with a 20% cost contingency of \$54,000. All of the tasks associated with the project are eligible for Brownfields funding. Therefore, the portions of the project budget which exceed the value of the Brownfields Petroleum Cleanup Grant will be funded through leveraged resources as described further in section 2.b.iii.

Sanford Transportation Center Brownfields Petroleum Cleanup Budget					
<i>Budget Categories</i>	<i>1) Cooperative Agreement Oversight & Engineering</i>	<i>2) Cleanup Activities</i>	<i>3) Community Involvement</i>	<i>4) Coordination & Reporting</i>	<i>Total</i>
Personnel	\$1,400	\$0	\$1,000	\$0	\$2,400
Travel	\$1,600	\$0	\$0	\$0	\$1,600
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Contractual	\$30,000	\$159,000	\$2,000	\$5,000	\$196,000
Total	\$33,000	\$159,000	\$3,000	\$5,000	\$200,000
Cost Share	\$7,000	\$29,000	\$2,000	\$2,000	\$40,000

The following tasks will be funded in part by the Brownfields Petroleum Cleanup Grant:

Task I: Cooperative Agreement Oversight & Engineering includes Town and consultant costs for the management, planning, engineering, design, bidding, and oversight of cleanup activities:

1. \$1,400 for Sanford personnel to manage grant and provide quarterly reports to EPA (20 hours at \$70 per hour)
2. \$1,600 for Sanford personnel to attend two EPA Brownfields Conferences (2 at \$800 each)
3. \$10,000 for planning, engineering, design, and bidding (100 hours at \$100 per hour)
4. \$5,000 for waste characterization and disposal facility coordination (6 disposal criteria samples at \$600 plus 14 hours at \$100 per hour)
5. \$15,000 for on-site oversight and documentation (150 hours at \$100 per hour)

It is estimated that the Town will provide grant management oversight and contractor coordination as an in-kind service at an estimated amount of \$7,000 (100 hours at \$70 per hour). Outputs for this task include Analysis of Brownfields Cleanup Alternatives (ABCA), EPA Quarterly reports, quarterly ACRES updates, engineering bidding documents, and cleanup oversight field reports.

Task II – Soil Cleanup Activities includes Contractor costs for the removal and disposal of grossly contaminated soil and the covering of residually contaminated soil. This budget allocates all costs to contractual items to complete the remediation of the Site and is further broken down as follows:

1. Approximately \$90,000 for removal of approximately 600 tons of contaminated soil from the site (estimated disposal at \$150 per ton for excavation, transportation, and disposal);
2. Approximately \$58,800 for capping of the Site with a pavement cover system (estimated at 19,600 square feet at \$3.00 per square foot); and
3. \$10,200 will be applied to the soil cover system (10,200 square feet at \$1 per square foot).

It is estimated that the Town will provide a direct cash financial contribution of \$29,000 for the

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remaining soil cover system (29,000 square feet at \$1 per square foot) to meet the match. Outputs for this include disposal manifests and as-built plans associated with the above activities.

Task III: Community Involvement includes development and implementation of a Community Relations Plan that will consist of notifying adjacent land owners of cleanup schedules and progress and holding two public meetings (pre and post cleanup activities) to educate and update the community regarding the cleanup and redevelopment activities. This task will also include regular briefings with the Town Council to keep them up to date on progress with the project. See Section 3.a for more details regarding the proposed community outreach program.

This task estimates \$1,000 (14.25 hours at \$70 per hour) for implementing the Community Involvement portions of the project and \$2,000 (20 hours at \$100 per hour) for consultant time to assist in the community outreach portion as well as preparing for and presenting at the public meetings. The Town will provide additional coordination and community outreach support as an in-kind service at an estimated amount of \$2,000 (28.5 hours at \$70 per hour). Outputs include the Community Relations Plan, handouts during public meetings as well as meeting minutes documenting the results of the meetings.

Task IV –Coordination & Reporting includes Consultant costs for ongoing coordination with the EPA Brownfields Program and the Maine DEP under the Voluntary Response Action Program (VRAP). Subtasks will include general communications, submission of status reports, and submitting a final report documenting that cleanup has been completed.

This task estimates \$5,000 for consultant time for developing the remediation summary report (50 hours at \$100 per hour). The Town will provide coordination and communications with the EPA and DEP as an in-kind service at an estimated amount of \$2,000 (28.5 hours at \$70 per hour). Outputs include the remediation summary report from as well as a Certificate of Completion from the Maine DEP VRAP Program.

2.b.ii. Plan for Tracking and Leveraging Progress

Our plan for tracking and measuring progress towards achieving the expected project outcomes is fairly straight forward and easy using the EPA Assessment, Cleanup and Redevelopment Exchange System (ACRES) database. The ACRES database is used to track the expected project outcomes presented in Sections 4a and 4b, including jobs created, other funds leveraged, private investment dollars leveraged, and acres of greenspace created. Sanford is currently implementing a long-term Brownfields program within the community. Therefore, the ACRES database is being updated on a quarterly basis for all sites in our program, in conjunction with the submittal of the EPA quarterly reports, and this practice will continue once cleanup and redevelopment activities are completed.

Success of the funding received to date as well as potential new funding is, and will continue to be, tracked and measured by the Town of Sanford in terms of number of properties assessed, acres of land cleaned up, and numbers of Phase I and Phase II reports filed (environmental benefits). The Town is also tracking the assessed property values, private and public money leveraged, and the number of new jobs associated with these projects (economic benefits). We have and will also measure the interest of the community in the Brownfields program by tracking the number of “hits” on the Town’s website (social benefits). Our Brownfields website link has an email address to allow users to convey a comment, concern, or compliment.

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The Maine DEP will also be utilized to track progress towards receiving a Certificate of Completion from the Maine DEP VRAP Program upon successful remediation of the site, as well as tracking institutional controls after remediation is completed. In addition, the Partners for a Healthy Community will be used to track health benefits from Brownfields redevelopment including lead poisoning in children, asthma, and cancer rates.

2.b.iii. Leveraging

As documented in **Attachment 4**, this project has already leveraged an estimated \$40,000 in Brownfields assessment funding. Other leveraging documented in **Attachment 4** includes: 1) Investments by private developers of \$20 million and \$10.5 million in historic renovations of mill buildings in the Mill Yard; and 2) Marketing and outreach efforts, event planning, and oversight by Sanford Downtown Legacy, Sanford Regional Economic Growth Council, and Sanford Trails. In addition, this project, through a Federal Transit Administration Bus Livability Grant that was awarded to York County Community Action, received \$1.2 million to assist with the construction of the transportation building.

Should the value of our proposed EPA Brownfields grant as well as in-kind services prove insufficient to complete cleanup activities at the Sanford Transportation Center site, we will request funding from Southern Maine Regional Planning Commission's (SMRPC's) Brownfields cleanup Revolving Loan Fund (RLF), the Maine DEP / Department of Economic and Community Development (DECD) RLF, or by a partnership of the two RLFs. Sanford has successfully applied for and utilized SMRPC RLF subgrants to complete remediation activities at the former Aerofab and Sanford Mill sites. The RLF subgrants utilized at these two project sites have leveraged \$3.78 million and are expected to generate an additional \$5.4 million in private investment and additional public funding.

The Town of Sanford is capable of obtaining, and experienced in properly managing, these funds. Therefore, it is very likely that these leveraged resources can be secured for this project. Other funding that can be leveraged includes the following:

Tax Increment Financing: The Site is currently within a Tax Increment Financing (TIF) district and funds generated from the TIF can be used for roadway improvements, open space, and sidewalk construction within the Mill Yard.

Pine Tree Zone: Maine's Pine Tree Zone Program is a package of tax incentives targeted to businesses choosing to locate or expand in distressed areas of the state (including Sanford). In York County, Pine Tree Zone incentives granted to 21 manufacturers in five communities have leveraged over 600 new jobs and \$32 million in private investment.

2.c. Programmatic Capability and Past Performance

2.c.i. Programmatic Capability

Sanford has an outstanding amount of experience in the administration of Brownfields projects and has developed a management system with demonstrated success. To complement the overall positive outlook towards Brownfields redevelopment maintained by Sanford's residents, a consistent and unified team has been assembled to ensure these projects flourish.

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The Town's overall Brownfields Program is under the direction of James Q. Gulnac, AICP, Planning Director. Mr. Gulnac has over thirty years of experience in community planning, including over 18 years working on Brownfields projects. In addition, Mr. Gulnac has successfully managed Sanford's 2004, 2008, and 2009 Brownfields Assessment Grants, the 2009 and 2010 Brownfields Cleanup grants for Sanford Mill site and Aerofab sites, and the 2011 Brownfields Area Wide Planning grant. He will continue these management responsibilities under this award. Mr. Gulnac is supported by the Town Manager, Mark Green, as well as James Niman, the Executive Director of the Sanford Regional Economic Growth Council. These team members have the ability to facilitate change in local government when needed and to reach out to developers who can turn a Brownfields site into a redevelopment success story.

The Town has received and managed \$5.6 million in CDBG money (provided by the federal government and distributed by the states) in the past 25 years. The Town is among the top 10 recipients in the state, a track record of success that was recognized in August 2007. These funds enabled housing rehabilitation, sewer and sidewalk reconstruction, and downtown revitalization.

These team members have demonstrated their commitment to a Sanford that will someday experience growth and economic success. As evidenced by their lengthy tenures, Sanford has the ability to retain this talent. In addition, as the office of Economic Development is growing through the addition of talented and experienced staff members, there is no doubt that additional or replacement qualified personnel could be obtained for the Brownfields team.

The Town believes in a competitive procurement process and generally issues a Request for Proposals (RFP) to solicit consultant responses. The RFPs are reviewed by the Town and interviews of the top submittals/firms are conducted. The selection of a consultant provides the Town with the technical expertise and resources to complete the projects and hopefully secure additional funding and developers.

2.c.ii. Adverse Audits

The Town has had no adverse audit findings.

2.c.iii. Past Performance: Has Received EPA Brownfields Grant(s)

The five most recent grant awards received by the Town of Sanford include two \$200,000 Brownfields Hazardous Substance Assessment grants, one in 2008 and another in 2009, and three EPA Brownfields Hazardous Substance Cleanup grants, one for the Sanford Mill site, and two for the Aerofab parcels. To date, we have successfully completed the required reporting obligations as well as managed our consultants within the scope of the project and the grant requirements.

Funding Expenditures: The Town has expended a total of \$1.0 million of the awarded Brownfields funds (no remaining funds) for the following:

- Completed and maintained an updated Brownfields inventory
- Completed 14 Phase I Environmental Site Assessments (ESAs)
- Prepared 5 site-specific Quality Assurance Project Plans and Phase II ESAs
- Completed the remediation of three contaminated and derelict former mill buildings in the historic Mill Yard and fostered their redevelopment,

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- Conducted Brownfields outreach meetings, and solicited input from residents, Maine Department of Environmental Protection, EPA, and interested stakeholders
- Attended four National Brownfields Conferences
- Conducted developer and mill owner meetings and outreach

Compliance with Grant Requirements: Since the award of our Brownfields grants, the Town has submitted the required quarterly reports. We have provided a breakdown of tasks completed and reported financial information. We have worked with four different EPA regional representatives, taking each on a tour of the community and introducing them to the potential Brownfields sites. In addition, Sanford has held numerous Brownfields Committee meetings where we have informed state and federal representatives of activities. The Town has also conducted DBE/MBE/ WBE reporting and has input all data into the ACRES database.

Accomplishments: Sanford has created two EPA Region 1 Brownfields Success Stories through previous grant awards. These sites are described below and documented in **Attachment 4**.

The Sanford Mill was initially assessed through the Town of Sanford's EPA Brownfields Assessment Grant. In addition, an ABCA/RAP was produced using the Town of Sanford's EPA Brownfields Cleanup Grant. Finally, Sanford developed a Quality Assurance Project Plan for use during the performance of remediation activities. Between 2009 and 2010, cleanup activities, including the removal and proper disposal of asbestos-containing materials and universal and hazardous wastes, and the excavation and disposal of polychlorinated biphenyl (PCB), metals, and petroleum-impacted soil, were completed at this property. Town of Sanford currently has a development agreement with a local developer. This \$10 million project includes the redevelopment of the site into 25,000 square feet of commercial office space and 36 residential units and will create 75 full-time jobs. This will be the first successful redevelopment of the mills in the Mill Yard. The Town has also experienced developer interest in several of the other properties assessed under this program. Once the Sanford Mill redevelopment is complete, we expect this to serve as a catalyst for future redevelopment of other mills in the Mill Yard.

In addition, the Town of Sanford recently completed the Brownfields-funded assessment and the initial phase of the redevelopment of the Aerofab Mill. Following assessment, remediation plans were developed using the Town of Sanford's EPA Brownfields Cleanup Grant. Beginning in 2009, cleanup activities, including the removal and proper disposal of asbestos and universal and hazardous wastes, and the abatement of hazardous industrial equipment, were completed at this site. The Town then developed specifications and project plans, and razed the Aerofab building in order to redevelop the site as a parking facility to support the adjacent Sanford Mill Brownfields project. The Town is currently producing design plans and specifications to construct the parking lot. This design will incorporate the installation of engineered controls to minimize environmental risk and maximize the use of eligible funding.

3. Community Engagement and Partnerships

3.a. Community Engagement Plan

Upon award of this grant, the Town will develop a Community Relations Plan that will outline the community involvement components of the project. This plan will follow similar approach that has been successful on our other Brownfields Projects. This includes regular briefings of the Town

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

Council, direct outreach to affected neighborhoods, and web and media outreach in the local area.

Regular briefings are currently held at Town Council meetings to: (1) update the public on status of the Site (including addressing the environmental issues at the site), (2) solicit public opinion as to reuse scenarios, and (3) provide a public forum for the community to voice any opinions, and concerns or questions regarding the site. These briefings will continue throughout the redevelopment of the property. Public briefings will be held to specifically address pre-cleanup planning and discuss post cleanup results for the project. The briefings will also be used to solicit public input on current environmental activities and cleanup decisions. The Town will also make all draft documents available for public review.

The Town will also communicate the progress of the project through neighborhood outreach, contact with adjacent landowners, mailings to landowners, and telephone calls and e-mails to community based organizations and key landowners. As development plans progress, they will be invited to public meetings. The Sanford News, a local newspaper, publishes articles summarizing each Town Council and public meeting. In addition, the Town of Sanford web site (www.sanfordmaine.org) provides regular updates on the status of the redevelopment and will direct the public to draft documents for review and comment.

Over 99% of the target community speaks English. However, translation services will be provided upon request.

3.b. Local, State, and Tribal Partnerships

The Maine DEP, Maine DHHS, and our community based organizations will serve as critical partners throughout this project. Each one provides a critical role in the successful implementation of the Brownfields Redevelopment Program.

3.b.i Local and State Agencies: The Maine DEP will be our partner throughout the cleanup process through participation in the Maine DEP VRAP program. Through this program, an approved remedial plan that is subsequently implemented to the satisfaction of the Maine DEP will result in the delivery of a Certificate of Completion and liability release.

3.b.ii Other Relevant Agencies: The Town of Sanford has also been working closely with the Maine DHHS to evaluate the health impacts in the industrial areas of Sanford. Much of the information cited in previous sections was provided by the Maine DHHS. Currently, the Maine DHHS is collecting data on blood lead levels of children who live in the target area. The details of the recent assessments are still pending but will be incorporated into future reports. Maine DHHS collects data on asthma, cancer, as well as information on other environmental health risks in the community, particularly those which impact sensitive populations. As a state agency, Maine DHHS can easily compare data collected in Sanford to other communities across the State.

3.b.iii Local Environmental Job Training Partnerships: Sanford plans to continue working with Sanford Regional Technical Center on job training projects in the Brownfields-impacted Mill Yard. See details below. To date, students have made a scale model of the Mill Yard and are currently using construction classes for the fabrication and installation of custom railings matching historic architecture in the Mill Yard, which will extend to the Transportation Center site.

3.c. Community-Based Organizations

Through the existing Brownfields Program, the Town has developed partnerships with a variety of community-based organizations to spur the revitalization of the target area and promote public involvement. A list of these organizations is below and letters of support are included in Attachment 3

Organization	Contact	Details
York County Community Action Corporation	Connie Garber Transportation Director 207.324.5762	YCCAC delivers social service, health, and educational programs to York County residents living in poverty, one being transportation for the needy. They will implement the construction of the Transportation Center and manage operations once constructed.
Sanford Trails	Hazen Carpenter Chairman 207.324.6869	This citizens group oversees the design and construction of trail connections through the Mill Yard, including recreational access to the Mousam River. The committee holds open meetings, sponsors fundraising events, coordinates trail maintenance, and applies for grant funds.
Sanford Regional Economic Growth Council	James Nimon Executive Director 207.324.9155	This council markets the Mill Yard to prospective developers, holds outreach events, and publicizes Brownfields Developments through its website www.sanfordgrowth.com
Sanford Downtown Legacy	Maura Herlihy President 207.651.1542	This volunteer-driven non-profit follows the National Main Street model of economic development. They hold events, oversee design review processes, nurture and recruit businesses, and promote the downtown.
Sanford Regional Technical Center	James Stopa, Executive Director 207.324.2942	This two-year technical program has engaged students in two projects in the Mill Yard: design and construction of historically accurate prototype of the original concrete railings and design and construction of a scale model of the Mill Yard. Additional projects are planned.

4. Project Benefits

4.a. Welfare and/or Public Health

Cleaning up and redeveloping a Brownfields site such as the Sanford Transportation Center can remove blight and environmental contamination, catalyze neighborhood revitalization, lessen development pressure at the urban edge, and use existing infrastructure. The remediation and redevelopment of the Site will generate the following environmental, social, and health benefits:

Environmental Benefits: The redevelopment of the Site will result in the collection and proper disposal of approximately 600 tons of grossly contaminated (i.e. petroleum saturated) soil that is a potential continuing source of petroleum contamination. This will remove the source area, improve soil quality, and protect downgradient environmental receptors, such as adjacent surface water and sediment. As described in Section 2.a.ii, short term measures, such as fencing, dust control, and signage, will be implemented during remediation and redevelopment to ensure the protection of the general community and sensitive populations, such as children who play in the area of the Site and pregnant women who live in the low income housing nearby. In addition, the public participation

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

program discussed in Section 3 will provide notice of work activities as well as contact information for questions or concerns.

The removal and/or management of impacted media at this project Site can help protect water quality by eliminating contaminated runoff before it reaches surface water. Runoff from contaminated sites such as the Sanford Transportation Center often contains chemicals and contaminants, which is the 2nd most common source of pollution for estuaries, the 3rd most common for lakes, and the 4th most common for rivers.

According to a 1999 EPA evaluation of the environmental benefits of infill versus greenfield development, siting a new development in an existing neighborhood, instead of on open space at the suburban fringe, can reduce miles driven by as much as 58 percent. Communities that make it easy for people to choose to walk, bicycle, or take public transit can also reduce air pollution by reducing automobile mileage and smog-forming emissions.

Social Benefits: This project will remediate a vacant and derelict property and allow for its redevelopment, thereby reducing blight, vandalism, and littering. The development of a centrally located Transportation Center is consistent with the directives of the Downtown Master Plan and will improve the quality of life of Sanford's residents by making it easier to get around town without an automobile. It will also improve the linkages between transit routes by integrating transit operations with the Town's trail network. In addition, a new transportation and public benefit-focused facility in the troubled Mill Yard will integrate equitable development principals, improve public perception, and encourage people to move back to the area, making it a center of Town life once again. Furthermore, through a collaborative effort with our community partners, this project will support the mixed use development of the adjacent Mill Yard. Additionally, by creating access to the Mousam River, children and area residents will finally be able to enjoy a beautiful natural resource that was always steps away but previously out of reach. This is also a Smart Growth project and will provide the overall social benefits described in Section 4.c.

Health Benefits: This project will result in the removal of a source area and mitigation of exposure pathways to the residents and sensitive populations. Specifically, the direct contact hazard associated with petroleum contaminated surficial soil will be eliminated, thereby protecting area children and adults who currently access the unrestricted Site. In addition, the remediation of the Site will allow residents to access to the Mousam River without fear of exposure to petroleum and other contaminants. Furthermore, the construction of a central transportation center will reduce vehicle air emissions, resulting in reduced risk of asthma for children, as well as healthier living conditions for pregnant women, the elderly, and the general population in the Mill Yard target area.

4.b. Economic Benefits and/or Greenspace

i) *Economic Benefits:* The successful award of this cleanup grant will leverage a significant amount of public cleanup and redevelopment dollars. Based on Sanford's policies of local contractor usage and job creation, these awards will have a direct impact on the Town's economy:

Brownfields Cleanup Grant Award Amount:	\$200,000
Private Redevelopment Investment in Surrounding Mill Yard Area:	\$20 Million to \$30 Million
Additional Annual Tax Revenue in Mill Yard Area:	\$1,000,000 to \$1,500,000
Housing Units and Jobs Created in Mill Yard Area	150 and Over 300

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Based on the above estimates it appears that just the increase in tax base alone will provide a 5-8 to 1 return of EPA grant funding on an annual basis and redevelopment investment dollars to Brownfields dollars provided of almost 100-150 to 1. The redevelopment of the Mill Yard will have a catalyzing effect on the downtown, including secondary financial benefits to area businesses and the encouragement of other redevelopment projects in the Mill Yard area.

ii) Non-Economic Benefits: The project will provide a direct linkage of the residents of Sanford to the Mousam River opening up miles of recreational uses in and along the river. The project will also be integrated into the existing Mill Yard bike path with linkage to Mousam Way South trail. It will connect neighborhoods, the downtown, the Mill Yard, and the industrial park. This project will also preserve an additional 25 acres of greenspace on the outskirts of Sanford by utilizing infill development of existing land. This project will truly exemplify a Brownfields success story by transforming a contaminated and blighted property into one which no longer threatens, but enriches, the lives of the target community.

Preserving natural lands and creating greenspace in peri-metropolitan areas, such as Sanford, protects farmland, wildlife habitat, outdoor recreation, and natural water filtration that ensures clean drinking water. The 2000 Rutgers University Center for Urban Policy and Research study for the state of New Jersey found that, compared to less compact growth, planned growth could reduce the conversion of farmland by 28%, open space by 43%, and environmentally fragile lands by 80%.

4.c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

The redevelopment of the Sanford Transportation Center site will have several environmental benefits beyond the remediation of contaminants. The combined project is considered a "Smart Growth" project as it incorporates the following sustainable redevelopment practices:

Project Action	Smart Growth Outcome
Create a link between the surrounding residential community, the downtown, and the Mill Yard.	Create walkable neighborhoods
Remove blighted conditions and replace this source of frustration with a quality of life improving transportation facility.	Promote community character and livability
Support the redevelopment of the adjacent Sanford Mill which contains office space, residential housing units, and greenspace.	Incorporate mixed land uses.
Evaluate RFPs for the use of local contractors and resources	Foster the use of local materials and resources
Preserve greenspace by focusing development on existing developed land.	Preserve open space, farmland, natural beauty, and critical environmental areas
Utilize infill development within the downtown area which will bring more jobs and homes to downtown, thus strengthening and directing development towards existing communities.	Strengthen and direct development towards existing communities
Demand high recycling rates during cleanup. For example, the Aerofab project achieved a recycling or re-use rate of 95%.	Promote green cleanups
Follow the Community Engagement Plan and work with community based organizations during cleanup and redevelopment.	Encourage community and stakeholder collaboration in development decisions

ATTACHMENT 1
THRESHOLD DOCUMENTATION

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

ATTACHMENT 1: THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility

- 1.a. Eligible Entity: The Town of Sanford is a general purpose unit of local government.
- 1.b. Site Ownership: The Town of Sanford acquired the property through a combination of a gift and a purchase on November 8, 2011. The town of Sanford is the sole owner of the property as demonstrated through quitclaim deed.

2. Letter from the State or Tribal Environmental Authority

See letter from the Maine Department of Environmental Protection (Maine DEP) in **Attachment 2**.

3. Site Eligibility and Property Ownership Eligibility

3.a. Basic Site Information:

- 3.a.i. Name of Site: Future Sanford Transportation Center Property (AKA River Walk 2, River Watch)
- 3.a.ii. Address of Site: Millyard Road, Map J29, Lot 17E, Sanford, Maine
- 3.a.iii. Current Owner of Site: Town of Sanford
- 3.a.iv. Date of Acquisition: November 8, 2011
- 3.b. Status and History of Contamination at the Site
 - 3.b.i. Nature of Contamination: The Site is contaminated by petroleum.
 - 3.b.ii. Operational History and Current Uses: The "Site" is an approximately 0.86-acre parcel of vacant undeveloped land designated by the Town of Sanford as Map J29 Lot 17E. The Site is currently vacant and there are currently no buildings located on the Site. The Site is located in the center of a historical textile mill complex and abuts the former location of the Goodall Worsted Mill. The Site has reportedly been historically used for activities associated with this former textile mill.
 - 3.b.iii. Environmental Concerns: The Site has been contaminated by a historical release of No. 6 fuel oil at an adjacent property. Petroleum contaminated soil and groundwater remain at the Site. Subsurface piping and structures at the Site represent a potential conduit for contaminants to impact adjacent surface water (Mousam River).
 - 3.b.iv. Cause and Nature and Extent of Contamination: Environmental investigations were conducted at the former Goodall Worsted Mill property for the release of approximately 7,000 to 10,000 gallons or more of No. 6 fuel oil related to an abandoned-in-place 500,000-gallon UST and associated piping located on the southeast corner of the Site. The Goodall Worsted Mill property is located upgradient of the Site relative to the presumed groundwater flow direction. Subsurface conduits or other preferential pathways caused No. 6 fuel oil that was released at this upgradient property to impact soil and groundwater at the Site, as well as surface water located adjacent to the Site. The area of impact is considered to include the entire aerial extent of the Site and extend to the groundwater table, which is reportedly 4 to 6 feet below existing surface grade.

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3.c. Sites Ineligible for Funding

- 3.c.i. The Site is not listed or proposed to be listed on the National Priority List
- 3.c.ii. The Site is not currently subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA
- 3.c.iii. The Site is not subject to jurisdiction, custody, or control of the United States Government.

3.d. Sites Requiring a Property-Specific Determination

- 3.d.i. The Site does not require a property-specific determination. This Site is not: (a) involved in a planned or ongoing CERCLA removal action; (b) subject to orders or permits issued under RCRA, FWPCA, TSCA, or SDWA; (c) undergoing active or planned corrective actions required under RCRA; (d) subject to the closure requirements under RCRA; (e) under current or potential future remediation orders to address a release of PCBs or (f) receiving or anticipated to receive monies for cleanup from a LUST trust fund.

3.e. Environmental Assessments Required for Cleanup Proposals

Type of Assessment	Report Title	Preparer	Date
ASTM E1527-05 Phase I ESA	Phase I Environmental Site Assessment	Weston & Sampson Engineers	January 2007
ASTM E1903-97(2002) Phase II ESA	Phase II Environmental Site Assessment	Weston & Sampson Engineers	May 2008
ASTM E1527-05 Phase I ESA	Phase I Environmental Site Assessment	Weston & Sampson Engineers	October 2011
ASTM E1903-2011 Phase II ESA	Draft Phase II Environmental Site Assessment	Weston & Sampson Engineers	November 2011

- 3.i. Petroleum Sites: The applicable petroleum determination letter submitted to the Maine DEP is included in **Attachment 7**.
- 3.i.i. Current and Immediate Past Owners: The current owner of the Site is the Town of Sanford. The previous owner is The High River Corporation of Manchester, Massachusetts.
- 3.i.ii. Acquisition of the Property: The Town of Sanford acquired the Site through a combination of a gift and a purchase on November 8, 2011.
- 3.i.iii. No Responsible Party for the Site: All disposal of petroleum occurred prior to acquisition by the current or immediate past owner. There is no history of petroleum dispensing on the Site. The Town of Sanford and the immediate past owner have not caused or contributed to any release at the Site. No disposal or dispensing of petroleum (by others) took place during ownership by the Town or the immediate past owner. Reasonable steps, including assessment and initial remediation, have been undertaken at the Site by the current and immediate past owner to address petroleum contamination.
- 3.i.iv. Cleaned Up by a Person Not Potentially Liable: No disposal or dispensing of petroleum (by others) took place during ownership by the Town of Sanford. The Town of did not cause or exacerbate any release at the Site. Reasonable steps, including assessment and initial

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

remediation, have been undertaken at the Site by the Town of Sanford to address petroleum contamination.

3.i.v. Relatively Low Risk: The Site is a relatively low risk when compared to other petroleum-contaminated sites in the State of Maine. No funding is being provided by the Maine DEP LUST fund for issues at the Site.

3.i.vi. Judgments, Orders, or Third Party Suits: No responsible party (including the Town of Sanford) is identified for the site through, either:

- A judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or
- An enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or
- A citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.

3.i.vii. Subject to RCRA: The Site is not subject to any order under section 9003(h) of the Solid Waste Disposal Act.

3.i.viii. Financial Viability of Responsible Parties: Current or immediate past owners identified as responsible for the contamination at the Site have the financial capability to satisfy their obligations under federal or state law to assess, investigate, or clean up the Site.

4. Cleanup Authority and Oversight Structure

4.a. Cleanup Oversight: The Site will be entered into the Maine DEP Voluntary Response Action Program. Under the Voluntary Response Action Program, the Maine DEP will provide technical review and comment on all plans, reports, and activities pertaining to cleanup of the Site.

The Town of Sanford will also hire an environmental consultant prior to implementing remediation activities at the Site. The consultant will obtain and evaluate remediation contractor bids, coordinate and oversee remediation activities, and document the remedial actions pertinent to the Maine DEP Voluntary Response Action Program. Sanford's procurement procedures will be consistent with 40 CFR 31.36.

4.b. Adjacent Property Access: Access to the adjacent properties will not be an issue for the remediation of the Site.

5. Cost Share

5.a. Source of Cost Share Funds: To meet the 20% cost share, the Town of Sanford will use direct financial contributions from the Town and/or a developer.

5.b. Cost Share Waiver: A hardship waiver is not being requested.

6. Community Notification.

The Town of Sanford hosted a public meeting at the Sanford Town Council meeting held on November 15, 2011 at 7:00 PM. Besides the selectman, approximately 22 additional people from the public attended. We did not receive any formal comments from the public. However, general

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

comments from the public were very positive and supportive of the grant application. The required documentation including a copy of the draft Analysis of Brownfields Cleanup Alternative, a copy of the meeting advertisement, a summary of comments received, responses to public comments, the meeting notes for the public meeting are included in **Attachment 6**.

ATTACHMENT 2
LETTER FROM STATE OR TRIBAL AUTHORITY



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

November 10, 2011

Ms. Diane Kelley
EPA Region 1
5 Post Office Square
Suite 100, Mailcode OSRR7-2
Boston, Massachusetts 02109-3912



Dear Ms. Kelley:

The Maine Department of Environmental Protection's ("Department") Bureau of Remediation and Waste Management acknowledges that the Town of Sanford plans to conduct site assessments and cleanup and is applying for federal Brownfields grant funds.

Jim Gulnac of the town has developed applications requesting federal Brownfields Site Assessment Grant funding for hazardous materials sites throughout the town (community wide), and has also developed clean-up applications for two properties, the River Watch and CGA sites.

If the town receives funding, the Department will assign project management staff to provide review and comment on all assessments, workplans, Quality Assurance Plans, and Health and Safety Plans. For cleanup at the River Watch and CGA sites, the Department's Voluntary Response Action Program ("VRAP") staff will provide review and comment on feasibility studies and remedial workplans, and will provide oversight (as necessary) of contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

Please feel free to call me directly at (207) 287-4854 should you have any questions regarding this letter.

Sincerely,

Nicholas J. Hodgkins
Voluntary Response Action Program
Division of Remediation
Maine Department of Environmental Protection

Pc: Don West, Environmental Management Support, Inc.
Jim Gulnac, Town of Sanford
Wilkes Harper, Maine DEP

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

ATTACHMENT 3
LETTERS OF SUPPORT FROM COMMUNITY BASED
ORGANIZATIONS



Nov. 23, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

York County Community Action Corporation applauds the Town of Sanford's efforts to clean up Brownfields sites in the Mill Yard. YCCAC was recently notified of a \$1.2 million award from the Federal Transit Administration's Bus Livability program to construct the Sanford Transportation Center. YCCAC will be working cooperatively with the Town as we consider sites for the transportation center in or near the Brownfields-impacted area.

As you know, York County Community Action is the county's anti-poverty agency and is particularly concerned that low-income people bear a disproportionate burden for the Brownfields sites in the Mill Yard because of the sites proximity to low-income neighborhoods. We are particularly aware of the need to clean up these sites because YCCAC's main administration building is adjacent to the Mill Yard.

YCCAC has seen great progress in the Mill Yard in recent years – namely the construction of a new road and the pending historic redevelopment of two mill buildings. We are now prepared to contribute to the redevelopment ourselves with the construction of a transportation center somewhere in or near the Brownfields-impacted area. The recently awarded a \$1.2 million grant from the FTA is to build a facility to serve as a hub for transit, bicycle and other future public transportation. We have begun the site selection process and all of the sites under consideration are in or near the Mill Yard. One of the sites under consideration is the former Abbott Reeve property proposed for cleanup. A variety of considerations will go into the site selection process. The Transportation Center will be a significant investment that builds on existing momentum. It should send a signal to others of the great redevelopment potential in the Mill Yard.

Sincerely,

Connie Garber
Transportation Director

Sanford Trail Development and Urban Forestry Committee
919 Main Street
Sanford, Me. 04073

Nov. 21, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

The Sanford Trails Committee has worked hand in hand with the clean up of Brownfields sites in the Mill Yard. We plan to continue that work.

We are an all-volunteer group with a strong record of accomplishments. To date we have developed a rail trail, a bike path, an urban/historic walk, a community forest, a 5K run and an adopt-a-trail program.

One of our goals is to develop a trail connection through the Mill Yard and the downtown. We have already developed pieces of that connection. Several years ago, we developed maps and signs for an urban/historic walk. Last year saw construction of the Mill Yard bike path. This year saw the construction of Mousam Way South.

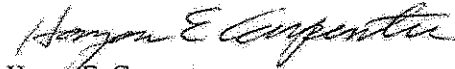
Securing additional brownfields funding will keep our momentum going, specifically by accelerating the development of a trail hub concept. Such a facility would not only complete the much-needed bicycle-pedestrian connection, but would include facilities, such as viewing platforms and access to the Mousam River, and a place to rent a bicycle or a kayak.

The trails committee pledges the following support:

- Continuation of our outreach, education and advocacy work around trail connections in the Mill Yard
- Continuation of our efforts to apply for trail construction grants
- Continuation of efforts to sponsor events that raise awareness of trails throughout the community

The Brownfields program has been good for the Mill Yard. We need to keep the momentum going. Thank you.

Sincerely,



Hazen E. Carpenter
Chairman

November 22, 2011

Lee Burnett, Grant Writer
Town of Sanford
919 Main Street
Sanford, ME 04073

Re: leveraging Brownfields for economic development

Dear Mr. Burnett:

I am pleased to write on behalf of the Sanford Regional Economic Growth Council (SREGC) to inform you of our intention to continue our role in marketing Brownfields sites in Sanford to potential developers. The SREGC is a private 501(c)(6) development corporation governed by a seven-member board of directors that includes membership from the Industrial Development Corporation of Sanford, the Sanford-Springvale Chamber of Commerce and the Town of Sanford-Village of Springvale. The SREGC was established in 2009 to consolidate and strengthen private and public economic development efforts in the Sanford Region by encouraging the creation and retention of jobs and the investment in real and personal property in order to improve the tax base.

One of the key objectives of the SREGC partners is the redevelopment of Sanford's historic Mill Yard District which was once the economic engine for this community and this region. Several exciting opportunities have recently emerged within the district including: the town's construction of a much-needed road to support and facilitate development; developers like Brady-Sullivan and the Northland Group committed to converting former mill buildings into multi-million dollar mixed-use development projects; receipt of a coveted pilot grant from the EPA to ensure achievable action steps; and receipt of an FTA grant for the Sanford Transportation Center (STC) which will serve as an intermodal hub for public transportation and intercity bus riders. Certainly a coordinated approach to the cleanup and redevelopment of Brownfields sites will go a long way to restoring the Mill Yard's historic economic role.

These activities send a powerful signal to other developers about the development potential of Brownfield sites. But all of this depends on maintaining momentum. There are still many Brownfield sites that need to be cleaned up, such as the CGA site and the STC site in the Mill Yard. The SREGC pledges to continue its active marketing role by:

- publicizing Brownfields program developments on our website;
- holding community outreach events such as the Brownfields Redevelopment Open House scheduled for December 2nd; and
- actively showing developers around the Mill Yard.

We remain strongly committed to Sanford's economic improvements and consider the Mill Yard District a priority area in our ongoing efforts. Please let us know how we can continue to be supportive moving forward.

Sincerely,



James F. Nimon
Executive Director

Nov. 23, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

Sanford Downtown Legacy (SDL), an affiliate of the National Main Street program, incorporated as a non-profit organization in 2007 with our main goal to revitalize Downtown Sanford. When we incorporated as a non-profit organization in 2007, we specifically included the Mill Yard in our program boundaries because our Downtown, our Mill Yard, and our Waterfront are intrinsically linked. The success of each depends on the success of all. Securing additional assessment and clean up grants under the EPA Brownfields program is important for the continuation of Sanford's work to revitalize the Mill Yard.


As you know, Sanford Downtown Legacy is a proud co-host of the "Mill Yard Redevelopment Open House" that will be held as part of the Holly Daze festival on Friday, December 2nd. At the Open House and throughout the month of December, the Mill Yard scale model built by Sanford Regional Technical Center students will be on display in our Downtown. The Open House will also include the showing of a student-made video about kayaking in the Mill Yard and the unveiling of new concept drawings for open space in the Mill Yard. It will be a great time for the public to educate themselves and ask questions.

SDL is engaged in another initiative that can help leverage Mill Yard redevelopment efforts. In the coming year, we plan to conduct a Downtown district market analysis to identify market niches and focus business expansion and recruitment efforts. This will include coordinating with Prof. Constantine Kontokosta at the Center for Sustainable Built Environment at New York University, who has agreed to engage 8-10 graduate level students next semester in developing an analysis and implementation plan for our Mid-town Mall adjacent to the Mill Yard.

These are the kinds of forums and events that SDL expects to continue to help organize and publicize as we advocate for the redevelopment of the Sanford Mill Yard.



Sincerely


Maura A. Herlihy, President
Sanford Downtown Legacy

898 Main Street / P.O. Box 1137
Sanford, Maine 04073

Sanford Regional Technical Center

52 Sanford High School Blvd.
Sanford, Maine 04073

Phone: (207) 324-2942
Fax: (207) 324-2957

Roland Legere
School Counselor
rlegere@sanford.org

James C. Stopa
Director
jstopa@sanford.org

Deanna Farrell
School Counselor
dfarrell@sanford.org

Kathy Sargent
Career Planning Counselor
ksargent@sanford.org

November 22, 2011

Lee Burnett, Grant Writer
Town of Sanford
919 Main Street
Sanford, ME 04073

Dear Mr. Burnett:

The Sanford Regional Technical Center plans to continue to be a partner in the redevelopment of the Sanford Mill Yard. Securing additional assessment and clean up grants under the EPA Brownfields program is important for all of this work to continue.

Our students value the real world experience that the redevelopment of the Mill Yard provides. We believe their work has helped the public visualize the future of the Mill Yard.

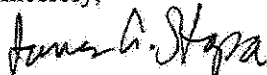
Sanford Regional Technical Center serves seven school districts in southern Maine. We provide instruction in automotive technology, building trades, computer assisted drafting and design, culinary arts, digital design, early childhood education, environmental science, graphic arts, computer & network systems, health occupations, media communications, pre-engineering/robotics, precision manufacturing, residential wiring, and welding.

As you know, our students have developed two projects valuable to the redevelopment of the Mill Yard. One was a historically accurate prototype of the concrete railings along the channelized part of the river. The other is a scale model of the Mill Yard, which is currently on display in the storefront at 907 Main Street in our downtown.

These are the type of learning activities we hope will continue with continued funding of the project. SRTC's project manager, Joseph Doiron, has taken a particular interest in this project and will provide leadership in coordinating the activities of the students. Finally, the scale model would continue to be improved and built out as Mill Yard redevelopment proceeds.

Thank you.

Sincerely,



James C. Stopa, Director

The Sanford Regional Technical Center is focused on providing students quality technical training, career awareness and employability skills to effectively assist them in their career choices.

ATTACHMENT 4
DOCUMENTATION OF LEVERAGED FUNDS

COOPERATIVE AGREEMENT HOME**Profile Information****Sanford, Town of**

Cooperative Agreement #: BF97117401

State: ME

Cooperative Agreement Type:

Assessment

Announcement Year: FY04

Award Date: 09/13/2004

Initial Project Period: 10/01/2004 to 10/15/2008

Current POP End Date:

Status: ☒ Closed Cooperative Agreement

Funding Source: Regionally Funded

Total Funded: \$200,000.00

Funding Type: Hazardous

PLEASE NOTE: Information shown is the most current in ACRES and may include draft and approved data.

Cooperative Agreement Contacts**Primary Contact:**Frank Gardner (EPA Regional Brownfields Team)
Gardner.Frank@epa.gov 6179181278**Data Reviewer:**Frank Gardner (EPA Regional Brownfields Team)
Gardner.Frank@epa.gov 6179181278**Cooperative Agreement Accomplishments**

Accomplishment Type	Property Name	Fiscal Year Counted
Phase I Environmental Assessment	Aerofab - Parcel 19A ACRES Property ID:35981	FY09
Phase I Environmental Assessment	Former CGA, Inc. Property (Map R16 Lot 41A) ACRES Property ID:18046	FY09
Phase I Environmental Assessment	Gallo Property (Map 127, Lot 30) ACRES Property ID:52581	FY09
Phase I Environmental Assessment	No 1 Pond ACRES Property ID:52641	FY09
Phase I Environmental Assessment	Reeve- Riverwalk 2 Map J29, Lot 17E ACRES Property ID:52661	FY09
Phase I Environmental Assessment	Riverwalk 4 (Map 129, Lot 81) ACRES Property ID:52681	FY09
Phase I Environmental Assessment	Riverwalk 5 (Map 129, Lot 73) ACRES Property ID:52701	FY09
Phase I Environmental Assessment	Riverwalk 7 (Map J30, Lot 44A) ACRES Property ID:52721	FY09
Phase I Environmental Assessment	Riverwalk 7A (Map 130, Lot 6) ACRES Property ID:52722	FY09
Phase I Environmental Assessment	Stone & Stone Property (Map J30, Lot 44) ACRES Property ID:52621	FY09

Pre-POP Authorization

This Cooperative Agreement does not have Pre-POP authorization.

Properties Addressed By This Cooperative Agreement

City: <input type="text" value="Select City"/>	State: <input type="text" value="Select State"/>	<input type="button" value="Print List"/>	<input type="button" value="Clear Filter"/>
Property	Actions	Status	Current Owner
Former CGA, Inc. Property (Map R16 Lot 41A) (Property Home) Submission Archive	Enter Data	Approved	None
Sanford Mill Greenway-Washington St (G100NY00) (Property Home) No Archive Available	Enter Data	Approved	None
Gallo Property (Map I27, Lot 30) (Property Home) Submission Archive	Enter Data	Approved	None
Stone & Stone Property (Map J30, Lot 44) (Property Home) Submission Archive	Enter Data	Approved	None
No 1 Pond (Property Home) Submission Archive	Enter Data	Approved	None
Reeve- Riverwalk 2 Map J29, Lot 17E (Property Home) Submission Archive	Enter Data	Approved	None
Riverwalk 4 (Map I29, Lot 81) (Property Home) Submission Archive	Enter Data	Approved	None
Riverwalk 5 (Map I29, Lot 73) (Property Home) Submission Archive	Enter Data	Approved	None
Riverwalk 7 (Map J30, Lot 44A) (Property Home) Submission Archive	Enter Data	Approved	None
Riverwalk 7A (Map I30, Lot 6) (Property Home) Submission Archive	Enter Data	Approved	None
Aerofab - Parcel 19A (Property Home) Submission Archive	Enter Data	Approved	None

[Add Property to this Cooperative Agreement](#)

Assessment Activities

Property	EPA Funding	Completion Date	Activity	Actions	Status
Former CGA, Inc. Property (Map R16 Lot 41A)	\$4,000.00	01/31/2007	Phase I Environmental Assessment	Enter Data	Approved
Former CGA, Inc. Property (Map R16 Lot 41A)	\$40,000.00	01/31/2008	Phase II Environmental Assessment	Enter Data	Approved
Reeve- Riverwalk 2 Map J29, Lot 17E	\$2,500.00	01/31/2007	Phase I Environmental Assessment	Enter Data	Approved
Reeve- Riverwalk 2 Map J29, Lot 17E	\$28,000.00	06/30/2006	Phase II Environmental Assessment	Enter Data	Approved
No 1 Pond	\$3,500.00	06/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Aerofab - Parcel 19A	\$3,300.00	10/31/2007	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 4 (Map I29, Lot 81)	\$2,500.00	11/30/2006	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 5 (Map I29, Lot 73)	\$2,500.00	01/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 7 (Map J30, Lot 44A)	\$2,500.00	01/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Riverwalk 7A (Map I30, Lot 6)	\$3,000.00	01/30/2007	Phase I Environmental Assessment	Enter Data	Approved
Gallo Property (Map I27, Lot 30)	\$3,000.00	12/30/2006	Phase I Environmental Assessment	Enter Data	Approved
Stone & Stone Property (Map J30, Lot 44)	\$3,000.00	07/30/2008	Phase I Environmental Assessment	Enter Data	Approved

EPA Assessment Funding: \$98,000.00
 Leveraged Funding: \$0.00
 Total Funding: \$98,000.00
 NOTE: Funding marked for deletion not included in totals

Cleanup Activities

Property	Is Cleanup Required?	Completion Date	Actions	Status
Riverwalk 7 (Map J30, Lot 44A)	Unknown		Enter Date	Approved

Cleanup Jobs Leveraged: 0
Leveraged Funding: \$0.00

NOTE: Funding marked for deletion not included in totals

Institutional & Engineering Controls

Property	Are ICs Required?	IC In Place	Are ECs Required?	EC In Place	Ready for Reuse?
Former CGA, Inc. Property (Map R16 Lot 41A)	No				No
Gallo Property (Map I27, Lot 30)	No				No
Stone & Stone Property (Map J30, Lot 44)	No				No
No 1 Pond	Unknown	Unknown			No
Reeve- Riverwalk 2 Map J29, Lot 17E	Yes	No	Yes	Yes	No
Riverwalk 4 (Map I20, Lot 81)	No				Yes, 0.60 acres
Riverwalk 5 (Map I29, Lot 73)	No				No
Riverwalk 7 (Map J30, Lot 44A)	Yes	Yes			No
Riverwalk 7A (Map I30, Lot 6)	No				No
Aerofab - Parcel 19A	Unknown				No

Properties Ready for Reuse: 1
Total Acres Ready for Reuse: 0.60

NOTE: Properties marked with an asterisk in the Ready for Reuse column are counted under another Cooperative Agreement. Their acre values are not included in the totals listed above.

Redevelopment and Other Leveraged Accomplishments

There are no Redevelopments for this Cooperative Agreement.

November 18, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Re: **Sanford, Maine Brownfield's Grant Letter of Support**

Dear Lee:

We are the prospective developers of the mostly vacant, Mill # 4 located in the Sanford Mill Yard District where Emery Street intersects the new town roadway. The name of our project is going to be *The Lofts @ # 4 Mill*. Our intent is to redevelop this mill into an adaptive reuse consisting of 143 apartments and 26,000 square feet of commercial space.

Our estimated capital injection into this project is \$20 Million, all of which will be with private funding. A development of this magnitude will bring both jobs and a high quality of living into this otherwise blighted section of town. It will also serve as a catalyst for future development in this historic in bringing it back to some semblance of economic life.

This area of Sanford is replete with old dilapidated mill buildings. It's also a leap of faith for us. However, as successful developers, we are able to see things for what they could be and not for what they are. There were a number of drivers which enticed us into developing in this area. One was the town's willingness to make it work for us in a partnership-type mentality. Another was the new town road which serves as a gateway to this area.

None of this would be possible, however, without grant money funding for the much needed Brownfield Remediation in this area. The cleanup that was done with prior grant funding helped in allowing the new road to be finished. It also served as a benefactor in cleaning-up the site(s) on and around our development.

Continued cleanup efforts such as those that have gone on in this Mill Yard are an integral part of promoting future successful development in this area. Indeed, we would not have gone forward with our development without the level of comfort that the Town of Sanford provided to us with respect to its continued commitment to future cleanup.

Lee Burnett

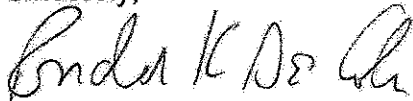
November 18, 2011

Page 2

We also realize that we do not stand alone in the success of our development going forward. The continued revitalization of other areas of the Mill Yard is a key component to our future success. However, this future development cannot be sustained without a continuance of the Brownfield cleanup efforts. We developers in the Mill Yard are all inextricably linked and, as such, dependent on a continued cleanup effort on the town's part.

To that end, we at Brady Sullivan Properties want to express our utmost support for the Town of Sanford and its efforts for future environmental cleanup. We would also plea for a continuance of grant money funding which would enable all of these visions for the future of the Mill Yard to come to fruition. I thank you very much for your consideration in this matter and, we look forward to the future success of the Mill Yard District.

Sincerely,



Ronald K DeCola
Brady Sullivan Properties, LLC
670 N. Commercial Street
Manchester, NH 03101



Nov. 23, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

York County Community Action Corporation applauds the Town of Sanford's efforts to clean up Brownfields sites in the Mill Yard. YCCAC was recently notified of a \$1.2 million award from the Federal Transit Administration's Bus Livability program to construct the Sanford Transportation Center. YCCAC will be working cooperatively with the Town as we consider sites for the transportation center in or near the Brownfields-impacted area.

As you know, York County Community Action is the county's anti-poverty agency and is particularly concerned that low-income people bear a disproportionate burden for the Brownfields sites in the Mill Yard because of the sites proximity to low-income neighborhoods. We are particularly aware of the need to clean up these sites because YCCAC's main administration building is adjacent to the Mill Yard.

YCCAC has seen great progress in the Mill Yard in recent years – namely the construction of a new road and the pending historic redevelopment of two mill buildings. We are now prepared to contribute to the redevelopment ourselves with the construction of a transportation center somewhere in or near the Brownfields-impacted area. The recently awarded a \$1.2 million grant from the FTA is to build a facility to serve as a hub for transit, bicycle and other future public transportation. We have begun the site selection process and all of the sites under consideration are in or near the Mill Yard. One of the sites under consideration is the former Abbott Reeve property proposed for cleanup. A variety of considerations will go into the site selection process. The Transportation Center will be a significant investment that builds on existing momentum. It should send a signal to others of the great redevelopment potential in the Mill Yard.

Sincerely,

Connie Garber
Transportation Director



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

November 17, 2010

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

Thank you for your inquiry regarding additional resources for cleaning up contaminated sites in your community. The Maine DEP shares the Town of Sanford's commitment to reclaiming Brownfields sites for productive uses. We know of your excellent track record, having worked cooperatively with you on assessing contamination at the Aerofab site, and we would certainly welcome working with you again. I can recommend two potential funding sources:

- The 128A program makes available grants of up to \$50,000 per site.
- The revolving loan/grant program – jointly administered through Department of Economic and Community Development – makes available grants of up to \$200,000 to municipalities and non-profits. Loans are also available to developers.

Should you need additional resources, please don't hesitate to apply. We will give your request full consideration. Thank you.

Sincerely,

Jean Firth, Brownfields Coordinator
Division of Remediation
Bureau of Remediation and Waste Management

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143



November 21, 2011

Lee Burnett
Grant Writer
Town of Sanford Maine

RE: Support Letter for Grant Application

Dear Mr. Burnett,

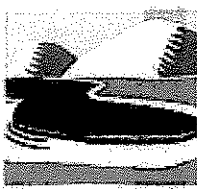
I am writing this letter to reiterate Northland Enterprises' strong support of the Town of Sanford's continued efforts to clean up contaminated properties in the Mill Yard area. This area was once the economic engine of the town, and with the town's coordinated approach to redevelopment, the mill district should again become a hub of activity. As you know, Northland has recently acquired 61 Washington Street, a centrally located dilapidated former mill building and is commencing a \$10.5mm historic rehabilitation to convert it into new residential and commercial space.

Our project does not stand alone; our success depends on continued public and private investment in our neighboring mills and public spaces. We would not have made this investment if we did not have confidence in the Town of Sanford's commitment and ability to leverage future EPA Brownfields funding to create additional economic opportunities in the Mill Yard.

Please let us know what else we can do to help with your Grant requisition efforts.

Sincerely,

Josh Benthien
Partner
Northland Enterprises, LLC
Portland Maine



SOUTHERN MAINE REGIONAL PLANNING COMMISSION

The Council of Governments
Serving the Municipalities of
Southwestern Maine

Acton
Alfred
Arundel
Baldwin
Berwick
Biddeford
Brownfield
Buxton
Cornish
Dayton
Denmark
Eliot
Fryeburg
Hiram
Hollis
Kennebunk
Kennebunkport
Kittery
Lebanon
Limerick
Limington
Lovell
Lyman
Newfield
North Berwick
Ogunquit
Old Orchard Beach
Parsonsfield
Porter
Saco
Sanford
Shapleigh
South Berwick
Stoneham
Stow
Sweden
Waterboro
Wells
York

November 23, 2011

Lee Burnett
Grant Writer
Town of Sanford
919 Main Street
Sanford, Me. 04073

Dear Mr. Burnett,

Thank you for your inquiry regarding additional resources for cleaning up contaminated sites in your community. The Southern Maine Regional Planning Commission shares the Town of Sanford's commitment to reclaiming Brownfields sites for productive uses. We know of your excellent track record, having worked cooperatively with you on cleanup activities at the Sanford Mill and Aerofab sites, and we would certainly welcome working with you again. SMRPC has one potential funding source:

- The revolving loan/grant program administered by Southern Maine Regional Planning Commission— makes available grants of up to \$200,000 to municipalities and non-profits. Loans are also available to developers.

Should you need additional resources, please don't hesitate to apply. We will give your request full consideration. Thank you.

Sincerely,

Paul Schumacher
Executive Director

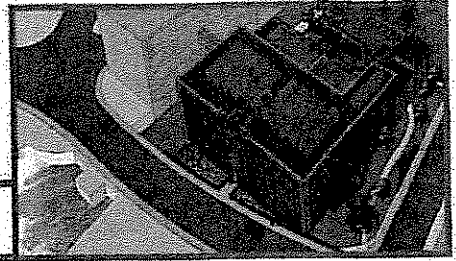


Land & Community Revitalization

BROWNFIELDS SUCCESS IN NEW ENGLAND

SANFORD MILL SITE

SANFORD, MAINE



PROPERTY DETAILS	Address:	61 Washington Street, Sanford, ME
	Former Use:	Manufacture of fabrics, light bulbs, and plastic products
CONTAMINANTS	Contaminants:	Asbestos, lead-based paint, semi volatile organic compounds (SVOCs), and PCBs
	Current Use:	Housing, commercial, and retail space
PARTNERS	Owner:	Town of Sanford
	Maine Department of Environmental Protection (DEP), Maine Neighborhood Stabilization Program (NSP), Southern Maine Regional Planning Commission (SMRPC), Town of Sanford, Northland Enterprises LLC	

FUNDING DETAILS	EPA Brownfields Assessment Grant:	\$110,000
	EPA Brownfields Cleanup Grant (ARRA):	\$200,000
HIGHLIGHTS	Maine NSP Grant:	\$3,000,000
	SMRPC Revolving Loan Fund Subgrant:	\$200,000
<i>Additional funding provided by Northland Properties LLC</i>		
<ul style="list-style-type: none"> Leveraged various components of EPA's Brownfields program to redevelop abandoned mill. New mixed-use development will contribute to revitalization of historic mill district. 		



The Sanford Mill Site is an excellent example of a shovel-ready project that benefitted from American Recovery and Reinvestment Act (ARRA) funding.

The project is also a case study on how the various components of EPA's Brownfields program can be leveraged together to create the synergy needed to redevelop a brownfield. The work completed by the Town is considered a success because the ARRA funding has been fully drawn down to complete the cleanup of the Sanford Mill site and advance the project to the redevelopment phase.

Motivation for Redevelopment: Located along the Mousam River in southwestern Maine, Sanford (population 20,806) thrived from the late 1800s to the 1950s as a vibrant textile mill town. When the mills closed, more than 3,500 residents lost their jobs. Although the town was successful in recruiting new industry, most of the new industrial base relocated or closed by the 1990s. Today, the town's unemployment and poverty rates are consistently higher than the County and State rates, and the median household income is significantly lower than the County median. Many of the large mills that surround the Mousam River are abandoned and deteriorated, including the former Sanford Mill. It is estimated that there are more than 30 brownfields sites in downtown Sanford, many of which are within the Sanford Mills Historic District, a 7.5-acre historic area listed on the National Register of Historic Places.

Property History: The Sanford Mill was formerly used for the manufacture of fabrics, light bulbs, and plastic products. This use resulted in a range of environmental contaminants including semi-volatile organic compounds (SVOCs) and PCBs. The building also contained lead-based paint and asbestos.

Project Result: Under its Community-Wide Brownfields Assessment Grant, the Town of Sanford conducted Phase I and Phase II Environmental Site Assessments (ESAs) for the

property in 2008. The following year, the Town continued its assessment activities, completing a supplemental ground water assessment and cleanup planning. By completing all of this work ahead of time with its assessment grant, the Town was prepared to take full advantage of the opportunity presented by ARRA funding. In 2009, the Town was awarded a \$200,000 ARRA Brownfields Cleanup Grant, plus a \$200,000 subgrant from the Southern Maine Regional Planning Commission (SMRPC) through its EPA Brownfields Revolving Loan Fund. This shovel-ready cleanup project was initiated immediately on the award date of August 3, 2009.

Grant-funded cleanup activities were completed in December 2010. The Town has signed a Memorandum of Agreement with Northland Enterprises LLC, a private developer, to complete the lead-paint abatement and redevelop this historic mill into a combination of housing units and retail/commercial space. To support these efforts, the project received a \$3 million grant from the Maine Neighborhood Stabilization Program (NSP).

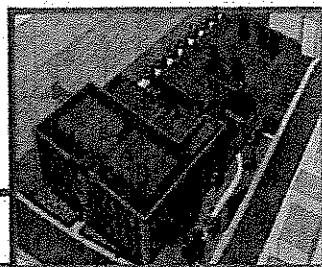
The cleanup and redevelopment of this property is part of an overall integrated effort to revitalize the entire Sanford Mills Historic District. Toward this end, the Town applied for and was awarded one of EPA's Area-Wide Planning pilot grants in 2010. EPA awarded just 23 of these innovative new grants nationwide to promote a coordinated and holistic approach to revitalizing neighborhoods impacted by numerous brownfields.

TIMELINE	
2008	Phase I and Phase II ESAs completed
2009	Supplemental assessment and cleanup Planning and implementation
2010	Grant-funded cleanup activities completed
2011 (expected)	Redevelopment lead-paint abatement to begin



BROWNFIELDS SUCCESS IN NEW ENGLAND

FORMER AEROFAB FACILITY SANFORD, MAINE



PROPERTY DETAILS	Address:	3 Aerofab Drive and 0 Pioneer Avenue, Sanford, ME
	Size:	0.73 acres
	Former Use:	Dye house, aircraft manufacturing facility
	Contaminants:	Chlorinated volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, petroleum, asbestos-containing material
	Current Use:	Parking lot
PARTNERS	Owner:	Town of Sanford
	Maine Department of Environmental Protection (DEP), Maine Neighborhood Stabilization Program (NSP), Southern Maine Regional Planning Commission (SMRPC), Town of Sanford, Northland Enterprises LLC	

Motivation for Redevelopment: From the 1800s through mid-20th century, the Town of Sanford, Maine was a vibrant mill town home to many sawmills and textile manufacturers. Sanford's economy was devastated when the mills closed in the 1950s, resulting in a loss of 3,500 jobs. Despite recruiting some new industry, the town's economy has never fully recovered. Today, unemployment and poverty rates in Sanford are consistently higher than the county and state rates, and median household income is below the county level. A product of its industrial past, downtown Sanford has more than 30 brownfield sites. Many of these sites are within the Sanford Mills Historic District, a 7.5-acre district that encompasses 14 historic buildings. The dilapidated mill buildings are a constant reminder of the area's hard times, and their redevelopment is at the center of Sanford's downtown revitalization strategy.

Property History: Located adjacent to the Mousam River in downtown Sanford, the former Aerofab building was built in the late 1800s as part of the Sanford Mills complex, a woolen mill. The building was used as a dye house and for storage until the mill closed in the 1950s. In 1960, Lake Aircraft purchased the property and used the facility to fabricate amphibious aircraft components under the Aerofab brand. Lake Aircraft vacated the site in 2002.

Because of the site's former industrial uses, the town suspected that the property had environmental contamination. Using funding from a Community-Wide EPA Brownfields Assessment Grant, the Town conducted Phase I and Phase II Environmental Site Assessments (ESAs). The assessments confirmed the presence of soil and groundwater contamination, including chlorinated volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and petroleum. The abandoned building also contained numerous hazardous substances as well as asbestos-containing materials.

FUNDING DETAILS	EPA Brownfields Assessment Grants (Phase I, 2011 Phase II, and Supplemental Assessments):	\$50,000
	EPA Brownfields Cleanup Grant:	\$400,000
	SMRPC Revolving Loan Fund Subgrant:	\$200,000
	Maine DEP (2008 Phase II Assessment):	\$17,000
HIGHLIGHTS	<ul style="list-style-type: none"> Removed or capped 500 tons of contaminated soil. Green building demolition recycled 95% of materials. New parking lot signals renewed investment in downtown, removes blighted structure, and provides parking to support nearby redevelopment projects. 	

Project Results: In 2009, the Town of Sanford acquired the two parcels that comprise the former Aerofab facility through eminent domain with the intention of remediating and redeveloping the site. The Town used \$400,000 in EPA Brownfields Cleanup Grants and a \$200,000 subgrant from the Southern Maine Regional Planning Commission (SMRPC) to initiate cleanup efforts. In order to fully address the contamination under the building and prevent it from entering the Mousam River, the structure had to be fully removed, an action that required Section 106 historical review. The building deconstruction incorporated concepts from EPA Region 1's Clean and Green Policy for contaminated sites, recycling 95% of materials. Cleanup activities included the removal of an onsite petroleum storage tank and the removal or capping of more than 500 tons of contaminated soil.

The Aerofab property is being redeveloped into a parking lot that will serve the adjacent Sanford Mill, a brownfield redevelopment project that has transformed an abandoned mill into a housing and commercial complex. The 60-space parking lot has the potential to be retrofitted into a multi-story parking facility at a later date. Together with the Sanford Mill redevelopment, the new parking lot signals renewed investment in Sanford's downtown and contributes to revitalization efforts by removing a blighted structure and providing the parking necessary to support nearby projects.

TIMELINE	
Oct. 2007	Phase I ESA completed
May 2008	Phase II ESA completed
June 2009	Updated Phase I ESA completed
June 2009	Town assumes ownership of property
Dec. 2009 – Summer 2011	Site cleanup
Spring 2011	Additional Phase II ESA completed
Fall 2011	Parking lot construction completed

ATTACHMENT 5
DOCUMENTATION OF COMMUNITY INVOLVEMENT



Public Meeting Notice

**PUBLIC NOTICE – TOWN COUNCIL
COUNCIL CHAMBERS – THIRD FLOOR
TOWN HALL ANNEX**

**TUESDAY, November 15, 2011
7:00PM**

**Town of Sanford
Town Council
Public Meeting Notice**

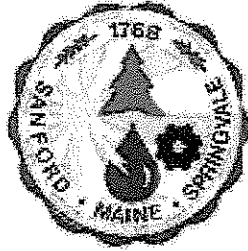
The Town of Sanford will hold a Public Meeting on Tuesday, November 15, 2011 at 7:00 P.M. at the Town Council Chambers, Sanford Town Hall, 919 Main Street, Sanford, Maine.

The purpose of the meeting is to discuss two draft Brownfields Cleanup Grant Applications and Analysis of Brownfields Cleanup Alternatives (ABCAs) to the EPA for the properties referred to as the Town of Sanford Multi Modal Site located on Tax map J29, lot 17E, High Street Sanford and the Former CGA Site located at 229 New Dam Road on Tax Map R16 lot 41A, Sanford. The Cleanup Grants will be for the remediation of soil contamination at these properties. The Town will prepare the draft application for the public's review and comment and will hold a public meeting to describe the information and the plans for cleanup in the grant application. Comments are due back to the planning office by November 27, 2011. The applications will be available to the public for review and comment from November 14th through November 27th. The draft grant applications and ABCAs will be available for review on the Town web site (www.sanfordmaine.org) and at the Planning Office. If you have questions or written comments please contact Jim Q. Gulnac, Director of Planning and Community Development at jgulgulnac@sanfordmaine.org.

All interested residents are invited to attend the public hearing and will be given an opportunity to be heard at that time. TDD/TTY users may call 711. If you are physically unable to access any of the Town's programs or services, please call Sherry Lord at 324-9173 so that accommodations can be made.

Date Posted:

Town of Sanford



From the Desk of
Mark A. Green

Memorandum

Date: Nov. 23, 2011
To: Lee Burnett
From: Mark Green
Re: Town Council meeting summary

At the regularly posted and televised Town Council meeting Nov. 15, 2011, the council heard a presentation from Planning Director James Gulnac on plans to submit three applications for Brownfields funding – one application for an town-wide assessment grant and two applications for cleanup grants. After hearing the presentation, the council asked for comments. None were received. The Town Council voted 6-0 to approve submitting the applications. Since the meeting, no comments have been received in writing or in person.

Respectfully submitted

Mark A. Green
Town Manager

ATTACHMENT 6
DRAFT ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

DRAFT ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

1. INTRODUCTION AND BACKGROUND

1.a. Site Location

The Sanford Transportation Center site is located at Millyard Road, Map J29, Lot 17E, Sanford, Maine (hereinafter, "the Site").

1.b. Previous Site Uses and Previous Cleanup and Remediation

The "Site" is an approximately 0.86-acre parcel of vacant undeveloped land designated by the Town of Sanford as Map J29 Lot 17E. The Site is currently vacant and there are currently no buildings located on the Site. The Site is located in the center of a historical textile mill complex and abuts the former location of the Goodall Worsted Mill. The Site has reportedly been historically used for activities associated with this former textile mill.

The Site has been contaminated by a historical release of No. 6 fuel oil at an adjacent property. Petroleum contaminated soil and groundwater remain at the Site. Subsurface piping and structures at the Site represent a potential conduit for contaminants to impact adjacent surface water (Mousam River).

1.c. Site Assessment Findings

A Phase I ESA was performed in October 2011 under the Sanford Brownfields Assessment Program that identified five recognized environmental conditions (RECs):

- REC 1. Documented Maine DEP releases and cleanup of No. 6 fuel oil associated with outfall #1 and outfall #2.
- REC 2. Petroleum sheen observed on water in the oil water separator associated with outfall #1.
- REC 3. Historical use of the Site for activities associated with a textile mill.
- REC 4. Historical use and documented releases of petroleum from the former Goodall Worsted Mill.
- REC 5. Abandoned piping entering the Site from High Street.
- REC 6. Two subsurface concrete vaults located in the center of the Site.

Environmental investigations were conducted at the former Goodall Worsted Mill property for the release of approximately 7,000 to 10,000 gallons or more of No. 6 fuel oil related to an abandoned-in-place 500,000-gallon UST and associated piping located on the southeast corner of the Site. The Goodall Worsted Mill property is located upgradient of the Site relative to the presumed groundwater flow direction. Subsurface conduits or other preferential pathways caused No. 6 fuel oil that was released at this upgradient property to impact soil and groundwater at the Site, as well as surface water located adjacent to the Site. The area of impact is considered to include the entire aerial extent of the Site and extend to the groundwater table, which is reportedly 4 to 6 feet below existing surface grade.

1.d. Project Goal

The goal of the Sanford Transportation Center project is the removal and proper disposal of grossly contaminated soil and the covering of remaining petroleum-impacted material to manage potential risk of exposure.

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

Following remediation, the Sanford Transportation Center site is proposed to be used as a "transit hub" for the people it serves not just through its transportation program, but also for recreation due to its strategic location along the Mousam River.

2. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.a. Cleanup Oversight and Responsibility

The cleanup will be overseen by an environmental professional in coordination with applicable guidelines and regulations of the Maine DEP and U.S. Environmental Protection Agency (EPA). All documents prepared for the Site will be submitted to the Maine DEP under Brownfields Site No. REM00828.

2.b. Cleanup Standards for Major Contaminants

The cleanup standards for the Site are anticipated to be the Maine DEP Remedial Action Guidelines (RAG) for Soil Contaminated with Hazardous Substances, The Maine DEP Maximum Exposure Guidelines (MEG) for Drinking Water, and the Maine DEP Remedial Action Guidelines (RAG) for Petroleum contaminated Sites in Maine. However, it is possible that additional regulatory standards will be applicable based on currently unknown Site conditions, or that risk-based cleanup standards will be used in accordance with Maine DEP guidelines.

2.c. Laws and Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Brownfields Revitalization Act, the Federal Davis-Bacon Act, the state environmental law, and town by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits and manifests will be obtained prior to commencement of the work.

3. EVALUATION OF CLEANUP ALTERNATIVES

3.a. Cleanup Alternatives Considered

To address contamination at the Site, three different cleanup alternatives were considered and are described below:

- Alternative 1: No Action
- Alternative 2: Excavation and off-Site disposal of grossly impacted (i.e. petroleum saturated) soil, characterization and on-Site disposal of residual contaminated soil using engineered controls, and quarterly groundwater monitoring for at least one year.
- Alternative 3: Excavation and off-Site disposal of all petroleum-impacted soil.

3.b. Cost Estimate of Cleanup Alternatives

To satisfy the U.S. EPA requirements, the effectiveness, feasibility, and cost of each alternative were considered prior to selecting a recommended cleanup alternative.

3.b.i. Effectiveness

- Alternative 1: This alternative is not effective in controlling or preventing the exposure of receptors to contamination at the Site, or in the elimination of a potential continuing contaminant source.

Future Sanford Transportation Center Brownfields Cleanup Grant Application, Sanford, ME

- Alternative 2: Excavation and off-Site disposal of grossly impacted (i.e. petroleum saturated) is an effective method for eliminating the direct contact exposure pathway, will be effective at eliminating a potential continuing source of contamination, and will protect the nearby environmental receptors. Covering remaining residual soil at the Site and the use of institutional controls is an effective way of eliminating the direct contact exposure pathway. Quarterly groundwater monitoring will provide valuable information regarding the quality of the groundwater over time. This information will be useful in making decisions regarding groundwater at the Site in the future.
- Alternative 3: Excavation and off-Site disposal of all petroleum-impacted soil is an effective method for eliminating the direct contact exposure pathway, will be effective at eliminating a potential continuing source of contamination, and will protect environmental receptors.

3.b.ii. Feasibility and Ease of Implementation

- Alternative 1: This alternative is easy to implement, as no actions will be conducted.
- Alternative 2: This alternative would utilize standard construction and transportation techniques for impacted soil containerization, off-Site transport, and disposal. Standard construction techniques would also be used to install the engineered soil cover. The collection and analysis of groundwater samples from the Site would be easily conducted using standard environmental sampling techniques. This alternative is technically practical and easily implementable at the Site.
- Alternative 3: This alternative would utilize standard construction and transportation techniques for impacted soil containerization, off-Site transport, and disposal. However, considering the high groundwater table and large volume of impacted soil (estimated at 6,500 tons) this alternative is technically feasible; however, not easily implementable.

3.b.iii. Cost Effectiveness

- Alternative 1: There would be no cost associated with Alternative 1.
- Alternative 2: The cost of Alternative 2 is estimated to be approximately \$323,000.
- Alternative 3: The cost of Alternative 3 is estimated to be approximately \$718,000.

3.c. Recommended Cleanup Alternative

The recommended cleanup alternative for the Site is presented below:

Alternative 2 is the recommended cleanup alternative for the Site because it is considered to be the most practical alternative to mitigate the risk posed by the contamination considering the proposed redevelopment scenario, reliability, effectiveness, feasibility, ease of implementation, and cost. Alternative 1 cannot be recommended because it does not address the risks posed by the contamination. Alternative 3 is not recommended because it involves removal of additional contaminated soil that can be more practically managed on-Site. Alternative 3 also involves remediation that is not easily implementable or cost-effective, considering the proposed redevelopment of the Site.

ATTACHMENT 7
STATE PETROLEUM DETERMINATION LETTER

Town of Sanford, Maine

Planning Department

917 MAIN STREET SUITE 300, SANFORD, MAINE 04073
(207) 324-9150 FAX (207) 324-9166

November 22, 2011

Mr. Wilkes B. Harper
Brownfields/VRAP Project Manager
Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
17 State House Station
Augusta, Maine 04333-00173

**Subject: Request for Determination of Petroleum Site Eligibility
Sanford Transportation Center (aka Riverwalk 2 Site)
Millyard Road, Map J29, Lot 17E
Sanford, Maine**

Dear Mr. Harper:

The Town of Sanford is applying for a FY 2012 U.S. EPA Brownfields Cleanup Grant for the above-referenced property (the Site). Based on available information and previous investigations completed under the Town of Sanford Brownfields Assessment Program, the Site has been contaminated by a release of petroleum and requires remediation prior to redevelopment. Petroleum-contaminated sites must meet certain requirements to be eligible for Brownfields funding. These requirements are presented at CERCLA section 101(39)(D). Per the U.S. EPA Proposal Guidelines for Brownfields Cleanup Grants (EPA-OSWER-OBLR-11-07), a petroleum eligibility determination for the purpose of brownfields funding must be presented by the EPA or a state as part of each Brownfields Cleanup Grant application. The Town of Sanford is therefore submitting this request for determination of site eligibility under the Petroleum Brownfields program.

Based on the information obtained to date (summarized below), we believe that this site meets the minimum criteria for selection under the Petroleum Brownfields. According to the EPA Brownfields Guidelines, for a petroleum-contaminated site to be entered into the Brownfields Petroleum Program, the site must first meet the definition of a Brownfield site to be eligible for funding, and then meet the following four (4) criteria:

1. The site is of "relatively low risk" compared with other "petroleum-only" sites in the state; and
2. There is no viable responsible party.
3. The site will not be assessed, investigated, or cleaned up by a person that is potentially liable for cleaning up the site.
4. The site must not be subject to a corrective action order under the Resource Conservation and Recovery Act (RCRA) §9003(h).

The following information is provided to demonstrate the site eligibility under the Brownfields Petroleum Program.

Background Information and Definition of Brownfields Site

Operational History and Current Uses:

The "Site" is an approximately 0.86-acre parcel of vacant undeveloped land designated by the Town of Sanford as Map J29 Lot 17E. The Site is currently vacant and there are currently no buildings located on the Site. The Site is located in the center of a historical textile mill complex and abuts the former location of the Goodall Worsted Mill. The Site has reportedly been historically used for activities associated with this former textile mill.

Environmental Concerns:

The Site has been contaminated by a historical release of No. 6 fuel oil at an adjacent property. Petroleum contaminated soil and groundwater remain at the Site. Subsurface piping and structures at the Site represent a potential conduit for contaminants to impact adjacent surface water (Mousam River).

Cause and Nature and Extent of Contamination:

Environmental investigations were conducted at the former Goodall Worsted Mill property for the release of approximately 7,000 to 10,000 gallons or more of No. 6 fuel oil related to an abandoned-in-place 500,000-gallon UST and associated piping located on the southeast corner of the Site. The Goodall Worsted Mill property is located upgradient of the Site relative to the presumed groundwater flow direction. Subsurface conduits or other preferential pathways caused No. 6 fuel oil that was released at this upgradient property to impact soil and groundwater at the Site, as well as surface water located adjacent to the Site. The area of impact is considered to include the entire aerial extent of the Site and extend to the groundwater table, which is reportedly 4 to 6 feet below existing surface grade.

Criteria 1 - Site is of "relatively low risk" compared with other "petroleum-only" sites in the state

The Site is considered a relatively low risk site due to:

1. The Site is not currently being cleaned up using LUST trust fund monies.
2. The Site is not currently subject to a response under the Oil Pollution Act (OPA).
3. The Site is not listed on the Maine DEP Petroleum Priority List.

Criteria 2 - There is no viable responsible party

A petroleum-contaminated site may be determined to have no responsible party if the site was last acquired through tax foreclosure, abandonment, or equivalent government proceedings, and that the site meets the criteria below:

1. An unresolved judgment rendered in a court of law or an administrative order that would require any party (including the applicant) to conduct the activities (including assessment, investigation or cleanup);

2. An unresolved enforcement action by federal or state authorities that would require any party (including the applicant) to conduct the activities (including assessment, investigation, or cleanup); or
3. An unresolved citizen suit, contribution action, or other third party claim brought against the current or immediate past owner for the site that would, if successful, require the activities (including assessment, investigation, or cleanup) to be conducted;

The Town of Sanford acquired the site on November 8, 2011. In addition, none of the criteria presented above are known to be applicable at the Site. Therefore, no responsible party has been identified for the Site.

Criteria 3 - The site will not be assessed, investigated, or cleaned up by a person that is potentially liable for cleaning up the site

The Brownfields Cleanup Grant applicant, The Town of Sanford, did not dispense or dispose of petroleum at this Site. In addition, the Town of Sanford did not exacerbate the contamination at the Site and took reasonable steps, including extensive assessment and cleanup planning, with regard to the contamination at the Site. Therefore, the Town of Sanford is not potentially liable for the cleanup.

Criteria 4 - The site must not be subject to a corrective action order under the Resource Conservation and Recovery Act (RCRA) §9003(h)

Based on preliminary research completed for the site, the subject property is not subject to a corrective action order under RCRA.

Request for Determination of Site Eligibility

Based on the information provided in this letter, we believe that this Site is a good candidate for receiving Brownfields funding to cleanup petroleum contamination.

We are a Town full of determined people committed to facing these challenges head on. We thank you in advance for your review of this request. If you should have any questions or require clarification on any element of this document, please give me a call at (207) 324-9173.

Very truly,
TOWN OF SANFORD

Mark Green
Town Manager



James Guinac
Planning Director, Brownfields Project Coordinator

cc: Diane Kelley, EPA Region 1 Brownfields Coordinator
Tom Benn, State of Maine DEP
Christopher Fournier, State of Maine DEP

ATTACHMENT 8
SPECIAL CONSIDERATIONS CHECKLIST FROM APPENDIX 3

Appendix 3 Special Considerations Checklist

Please identify (with an **X**) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

- ☐ Community population is 10,000 or less
- ☐ Federally recognized Indian tribe
- ☐ United States territory
- ☐ Applicant assisting a Tribe or territory
- ☐ Targeted brownfield sites are impacted by mine-scarred land
- ☐ Targeted brownfield sites are contaminated with controlled substances
- ☐ Community is impacted by recent natural disaster(s)
- ☒ Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- ☒ Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy
- ☒ Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant
- ☒ Community is implementing green remediation plans